

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

CRAIG CUNNINGHAM,

Plaintiff,

v.

**ENAGIC USA, INC.; PETER POLSELLI;
TERRY COLLINS; RICK FREEMAN;
ANGELINA LINER; CHRISTIAN KINNEY;
THE 7 FIGURE WEALTH CORPORATION;
CORAZON MANAGEMENT GROUP, INC.;
JEFFREY HOWARD; SUSIE TREMBLAY-
BROWN; PETER WOLFING; MULTIPLEX
SYSTEMS, INC.; BRIAN KAPLAN; WALTER
PETERSON; MY MINDS EYE, LLC;
800LINK, INC.; SCOTT BIEL; JERRY
MAURER; DAVE HILL AKA DAVE ALLEN
AKA DAVE ALEEN; and JOHN AND JANE
DOE'S 1-10,**

Defendants.

Case No. 3:15-cv-00847

**RESPONSE OF SCOTT BIEL AND 800 LINK TO PLAINTIFF'S MOTION TO AMEND
THE COMPLAINT**

COMES NOW the Defendants, 800 Link, Inc. and Scott Biel, by and through counsel, and herein responds to the Plaintiff's motion to amend the Complaint as follows:

The Plaintiff motion makes references to schemes and ringleaders but he has not submitted a proposed amended complaint and his explanation of the proposed amendments are insufficiently specific for these Defendants to analyze the appropriateness of same. These Defendants believe a proposed amended complaint should be submitted with such a motion in order for the Court and the parties to consider the merits of the motion. Without being able to

see what the Plaintiff might add into the Complaint this Defendant must object to the motion being granted.

Additionally there is a pending motion to dismiss, filed by a co-defendant.

Wherefore, these Defendants ask and pray that the Plaintiff's motion to amend the complaint, docket number 139, be denied.

Respectfully submitted,

SPICER RUDSTROM PLLC

/s/ Darrick L. O'Dell

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Attorney for Defendants Scott Biel and 800Link

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via the Court's ECF notice system and via regular US Mail, postage prepaid and properly addressed, to:

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this 11th day of March, 2016.

/s/ Darrick L. O'Dell
Darrick L. O'Dell